

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEFFREY M. NORMAN,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 06-005-JJF
	:	
DAVID W. ELKIN, RICHARD M. SHORIN	:	
and THE ELKIN GROUP, INC.	:	Jury Trial Demanded
	:	
Defendants,	:	
	:	
and	:	
	:	
US MOBILCOMM, INC.,	:	
	:	
Nominal Defendant.	:	

PLAINTIFF'S REPLY TO DEFENDANTS' COUNTERCLAIM

Plaintiff, Jeffrey M. Norman ("Plaintiff") files his reply to the counterclaim of Defendants David W. Elkin, Richard M. Shorin and U.S. Mobilcomm, Inc. (collectively, "Defendants"). In support of his reply, Plaintiff responds as follows:

125. Admitted.

126. Denied.

127. Admitted.

128. It is denied that Elkin contributed \$750,000 to the Company in either cash or equity. Upon information and belief, Plaintiff admits that Elkin purports to have advanced additional funds to the Company to pay certain operating expenses.

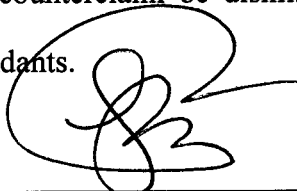
129. Denied. By way of further response, Plaintiff responds by stating that he made a \$250,000 contribution to the Company in both cash and equity, the sufficiency of which was acknowledged by the Company through both written acknowledgement and performance. It is

denied that Plaintiff withdrew any funds from the Company or otherwise diminished his equity interest in the Company.

130. Denied.

131. Denied.

WHEREFORE, Plaintiff respectfully requests that the Court deny all relief requested under the counterclaim and that Defendants' counterclaim be dismissed with prejudice, with costs and attorneys' fees assessed against Defendants.



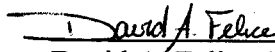
Dated: February 28, 2006

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CERTIFICATE OF SERVICE

I, David A. Felice, do hereby certify that on February 28, 2006, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

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